

1 MARK J. BOURASSA, ESQ. (NBN 7999)  
2 JENNIFER A. FORNETTI, ESQ. (NBN 7644)  
3 VALERIE S. CHRISTIAN ESQ. (NBN 14716)  
**4 THE BOURASSA LAW GROUP**  
5 2350 W. Charleston Blvd., Suite 100  
Las Vegas, Nevada 89102  
Telephone: (702) 851-2180  
mbourassa@blgwins.com  
jfornetti@blgwins.com  
vgray@blgwins.com

*Attorneys for Plaintiff and the Proposed Class  
[Additional counsel on signature page]*

8 Todd L. Bice  
9 **PISANELLI BICE PLLC**  
10 400 S. 7th Street Suite 300  
Las Vegas, NV 89101  
Telephone: 702.214.2100  
tlb@pisanellibice.com

<sup>15</sup> \**Pro hac vice application forthcoming*

*Attorneys for Defendant  
MGM Resorts International*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

CHARLES BEZAK, individually and on behalf  
of all others similarly situated

Case No. 2:23-cv-01719-RFB-BNW

**STIPULATION TO EXTEND TIME  
TO FILE DEFENDANT'S  
RESPONSE TO COMPLAINT  
(FOURTH REQUEST)**

**Plaintiff.**

v.

1 Pursuant to LR IA 6-1, Plaintiff Charles Bezak and Defendant MGM Resorts  
 2 International (“MGM”) (collectively, the “Parties”) respectfully stipulate MGM’s time to  
 3 respond to the Complaint be extended from the current deadline of March 11, 2024 to and  
 4 including April 10, 2024. This is the fourth stipulation for an extension of time to file  
 5 MGM’s responsive pleading. The court previously granted an extension on January 11,  
 6 2024. ECF No. 16.

7 Good cause exists to enlarge the time for MGM to respond to the Complaint. There  
 8 are currently thirteen other related actions filed against MGM pending in this District (the  
 9 “Related Actions”). *See Owens v. MGM Resorts Int’l*, No. 2:23-cv-01480; *Kirwan v. MGM*  
 10 *Resorts Int’l*, No. 2:23-cv-01481; *Lackey v. MGM Resorts Int’l*, No. 2:23-cv-01549;  
 11 *Zussman v. VICI Properties I LLC, et al.*, No. 2:23-cv-01537; *Terezo v. MGM Resorts Int’l*,  
 12 No. 2:23-cv-01577; *Pircio v. MGM Resorts Int’l*, No. 2:23-cv-01550; *Rundell v. MGM*  
 13 *Resorts Int’l*, No. 2:23-cv-01698; *Albrigo v. MGM Resorts Int’l*, No. 2:23-cv-1981; *Zari v.*  
 14 *MGM Resorts Int’l*, No. 2:23-cv-01777; *Manson v. MGM Resorts Int’l*, No. 2:23-cv-01826;  
 15 *Sloan v. Vici Properties Inc., et al.*, No. 2:23-cv-02042; *Mejia v. MGM Resorts, Int’l*, No.  
 16 2:23-cv-00081; *Righetti v. MGM Resorts Int’l*, 2:23-cv-2064.

17 On December 6 and December 20, 2023, plaintiffs’ counsel in six consolidated  
 18 putative class actions brought against MGM by individuals who allege their PII was  
 19 compromised as a result of a cybersecurity incident involving MGM in 2019 (the “2019  
 20 Actions”) filed Notices of Related Cases Pursuant to District of Nevada Local Rule 42.1,  
 21 notifying the Court that the Related Actions are related to the 2019 Actions. *In re: MGM*  
 22 *Resorts Int’l Data Breach Litig.*, No. 2:20-CV-00376-GMN-NJK, ECF Nos. 186, 188.  
 23 Plaintiffs in this action oppose this effort because the 2019 Actions involved a different  
 24 threat actor and different data. No order has issued on the notices filed by the plaintiffs in  
 25 the 2019 Actions, and MGM has not responded to any other Complaint in the Related  
 26 Actions.

27 The parties in the Related Actions are discussing this development in addition to the  
 28 consolidation of the Related Actions. The parties in the Related Actions have also engaged

1 in preliminary information exchange that may avoid the need for certain motion practice,  
2 which would conserve judicial resources. As such, additional time is required to permit time  
3 to meet and confer with the various parties to the Related Actions.

4 The Parties' request is made in good faith to enable the parties to finalize the joint  
5 motion for consolidation and conserve judicial and party resources. Moreover, this case is  
6 in its infancy, and this request will not prejudice any party.

7 **WHEREAS** the Parties respectfully request that MGM shall have until April 10,  
8 2024, to answer, move, or otherwise respond to the Complaint.

9 Dated: March 8, 2024

Respectfully submitted,

10 /s/ Jennifer A. Fornetti  
11 MARK J. BOURASSA  
12 JENNIFER A. FORNETTI  
13 VALERIE S. CHRISTIAN  
14 **THE BOURASSA LAW GROUP**  
15 2350 W. Charleston Blvd., Suite 100  
Las Vegas, Nevada 89102  
Telephone: (702) 851-2180  
mbourassa@blgwins.com  
jfornetti@blgwins.com  
vchristian@blgwins.com

16 GARY F. LYNCH (*pro hac vice*)  
17 PATRICK D. DONATHEN (*pro hac vice*)  
18 **LYNCH CARPENTER LLP**  
19 1133 Penn Avenue, 5th Floor  
Pittsburgh, Pennsylvania 15222  
Telephone: (412) 322-9243  
gary@lcllp.com  
patrick@lcllp.com

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21 *Attorneys for Plaintiff and the Proposed  
Class*

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25  
26  
27  
28

/s/ Todd L. Bice

Todd L. Bice  
**PISANELLI BICE, PLLC**  
400 S. 7th Street Suite 300  
Las Vegas, NV 89101  
Telephone: 702.214.2100  
tlb@pisanellibice.com

Angela C. Agrusa  
**DLA PIPER LLP (US)**  
2000 Avenue of the Stars  
Suite 400 North Tower  
Los Angeles, CA 90067-4735  
Telephone: 310.595.3000  
[Angela.agrusa@us.dlapiper.com](mailto:Angela.agrusa@us.dlapiper.com)

*Attorneys for Defendant  
MGM Resorts International*

1                   **UNITED STATES DISTRICT COURT**  
2                   **DISTRICT OF NEVADA**

3 CHARLES BEZAK, individually and on behalf  
4 of all others similarly situated,

5                   Plaintiff,

6                   v.

7                   MGM RESORTS INTERNATIONAL,

8                   Defendant.

Case No. 2:23-cv-01719-RFB-BNW

**[PROPOSED] ORDER GRANTING  
STIPULATION TO EXTEND TIME  
TO FILE DEFENDANT'S  
RESPONSE TO COMPLAINT**

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10                 Upon consideration of the foregoing stipulation to extend Defendant MGM Resorts  
11 International's time to file response to Plaintiff's Complaint in the above-captioned action,  
12 it is hereby **ORDERED** that the Stipulation is **GRANTED**, and the time for MGM Resorts  
13 International to answer, move, or otherwise respond to Plaintiff's Complaint is hereby  
14 extended to and including April 10, 2024.

15  
16                 **IT IS SO ORDERED:**

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18                 \_\_\_\_\_  
19                 THE HONORABLE BRENDA WEKSLER  
20                 UNITED STATES MAGISTRATE JUDGE

21  
22                 DATED: 3/11/2024  
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[PROPOSED] ORDER GRANTING STIPULATION TO EXTEND TIME TO FILE DEFENDANT'S  
RESPONSE TO COMPLAINT  
CASE NO. 2:23-CV-01719